

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

<p>Yasmeenah Morrow, <i>on behalf of herself and all others similarly situated,</i></p> <p style="text-align:center">Plaintiff,</p> <p>v.</p> <p>Golden Corral Corporation,</p> <p style="text-align:center">Defendant.</p>	<p>CASE NO. 5:24-cv-00123-M-BM</p>
<p>Wayland Bennett, <i>individually and on behalf of all others similarly situated,</i></p> <p style="text-align:center">Plaintiff,</p> <p>v.</p> <p>Golden Corral Corporation,</p> <p style="text-align:center">Defendant.</p>	<p>CASE NO. 5:24-CV-00124-FL</p>
<p>Ashley Hunt, <i>individually and on behalf of all others similarly situated,</i></p> <p style="text-align:center">Plaintiff,</p> <p>v.</p> <p>Golden Corral Corporation,</p> <p style="text-align:center">Defendant</p>	<p>CASE NO. 5:24-cv-00125-D</p>

<p>Christie Brooks, <i>individually and on behalf of all others similarly situated</i></p> <p>Plaintiff</p> <p>v.</p> <p>Golden Corral Corporation,</p> <p>Defendant.</p>	<p>CASE NO. 5:24-cv-00129-D</p>
<p>Carlton Brand, <i>individually and on behalf of all others similarly situated,</i></p> <p>Plaintiff,</p> <p>v.</p> <p>Golden Corral Corporation,</p> <p>Defendant</p>	<p>CASE NO. 5:24-cv-00132-FL</p>
<p>Mika Inelus, <i>individually and on behalf of all others similarly situated,</i></p> <p>Plaintiff,</p> <p>v.</p> <p>Golden Corral Corporation,</p> <p>Defendant</p>	<p>CASE NO. 5:24-cv-00141-FL</p>

**PLAINTIFFS' UNOPPOSED MOTION
TO CONSOLIDATE CASES PURSUANT TO FED. R. CIV. P. 42(A)**

Pursuant to Federal Rule of Civil Procedure 42(a)(2), Plaintiffs in the above-captioned cases, individually and on behalf of all others similarly situated, respectfully move for an Order consolidating the following matters (the “Golden Corral Actions”) now pending before this Court against Defendant Goldan Corral Corporation (“Defendant” or “Golden Corral”): *Yasmeenah*

Morrow v. Golden Corral, 5:24-cv-00123-M (E.D.N.C.); *Wayland Bennett v. Golden Corral*, 5:24-cv-00124-FL (E.D.N.C.); *Ashley Hunt v. Golden Corral*, 5:24-cv-00125-D (E.D.N.C.); *Christie Brooks v. Golden Corral*, 5:24-cv-00129-D (E.D.N.C.); *Carlton Brand v. Golden Corral*, 5:24-cv-00132-FL (E.D.N.C.), *Mika Inelus v. Golden Corral*, 5:24-cv-00141-FL (E.D.N.C.).

As set forth fully in Plaintiffs' memorandum of law in support, Plaintiffs bring these actions on behalf of themselves, and others similarly situated, alleging Defendants' unlawful and unauthorized disclosure of their personally identifiable information (PII) caused them damages. The Golden Corral Actions arise out of the same operative facts—namely the same cybersecurity incident, which Plaintiffs allege allowed a third-party's unauthorized access to Plaintiffs PII.

The Golden Corral Actions assert similar causes of action, define overlapping classes, and seek similar remedies as against the same Defendant.

Plaintiffs further request that the Court adjourn all deadlines for Defendant to file a responsive pleading in the Golden Corral Actions pending the filing of a consolidated complaint. Plaintiffs request leave to file a consolidated complaint not later than thirty (30) days after an order granting this consolidation motion.

Plaintiffs' Counsel in all the Golden Corral Actions have conferred among themselves, and with counsel for Defendant about this motion. Neither Defendant nor any plaintiffs in any of the Golden Corral Actions oppose consolidation of the Golden Corral Actions under Fed. R. Civ. P. 42(a).

Dated: April 12, 2024

Respectfully submitted,

/s/ Scott C. Harris

Scott C. Harris

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**Special Appearance Forthcoming*

*Counsel for Plaintiffs in the Related Actions and the
Putative Classes*

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of April, the foregoing document has been served by the Court's CM/ECF system which will serve a copy via email to all counsel of record.

/s/ Scott C. Harris

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